

SUSAN S. MUCK (SBN 126930)
susan.muck@wilmerhale.com
KEVIN P. MUCK (SBN 120918)
kevin.muck@wilmerhale.com
WILLIAM BRENC (SBN 318544)
william.brenc@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
One Front Street, Suite 3500
San Francisco, CA 94111
Telephone: (628) 235-1002
Facsimile: (628) 235-1001

JEREMY T. ADLER (*admitted pro hac vice*)
jeremy.adler@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 937-7300

JOSEPH M. LEVY (SBN 329318)
joseph.levy@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

Attorneys for Defendants
ZUORA, INC., TIEN TZUO, and TYLER SLOAT
[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASEY ROBERTS, Individually and On
Behalf of All Other Similarly Situated,

Plaintiff,

v.

ZUORA, INC., TIEN TZUO, and TYLER
SLOAT,

Defendants.

No. 3:19-cv-03422-SI

**JOINT CASE MANAGEMENT
STATEMENT**

Date: April 1, 2022
Time: 3:00 p.m.
Dept.: Courtroom 1, 17th Floor
Judge: Hon. Susan Illston
Date Action Filed: June 14, 2019

1 The Parties last appeared before the Court for a case management conference (“CMC”) on
2 February 11, 2022, at which the Court set a further CMC for April 1, 2022.

3 Pursuant to the Court’s direction at the February 11, 2022 CMC and Local Civil Rule 16-
4 10(d), Lead Plaintiff and Class Representative New Zealand Methodist Trust Association (“MTA” or
5 “Lead Plaintiff”) and defendants Zuora, Inc. (“Zuora” or the “Company”), Tien Tzuo, and Tyler
6 Sloat (collectively, “Defendants”) hereby jointly submit this Subsequent Case Management
7 Statement in advance of the April 1, 2022 CMC. There are currently no disputed issues.

8 **I. STATUS OF DISCOVERY**

9 Plaintiffs have deposed three current Zuora employees: Robert Hildenbrand, Matthew
10 Rochester, and Karthik Ramamoorthy. Current Zuora employee Tom Krackeler is scheduled to be
11 deposed on March 29, 2022. Plaintiffs and Defendants are coordinating regarding the deposition by
12 Plaintiffs of an additional six current and former Zuora executives, including the two named
13 individual defendants (Messrs. Tzuo and Sloat). Defendants are also in the process of coordinating
14 the depositions of the four individuals identified by Plaintiffs as confidential witnesses.

15 Plaintiffs have propounded requests for admission relating to the authenticity of certain
16 documents and have subpoenaed documents from three third parties. Defendants have propounded
17 interrogatories and document requests on Plaintiffs.

18 **II. STATUS OF MEDIATION**

19 Pursuant to the Court’s direction at the April 23, 2021 CMC, the Parties and their counsel
20 participated in a mediation on January 18, 2022, before Robert A. Meyer, Esq. of JAMS. The Parties
21 did not reach a resolution. The Parties have had a number of follow-up discussions with the
22 mediator since that time. The Parties remain willing to continue working with the mediator but
23 believe the case should continue moving forward.

24 **III. MOTIONS**

25 Following the conclusion of discovery, the Parties intend to move for summary judgment on
26 asserted claims, defenses, and issues.

1 Dated: March 25, 2022

WILMER CUTLER PICKERING HALE
AND DORR LLP

2 By: /s/ Susan S. Muck
3 Susan S. Muck

4 *Attorneys for Defendants Zuora, Inc., Tien Tzuo
and Tyler Sloat*

5 Dated: March 25, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP

6 By: /s/ Steve W. Berman
7 Steve W. Berman

8 Steve W. Berman (admitted *Pro Hac Vice*)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

11 Reed R. Kathrein (139304)
Lucas E. Gilmore (250893)
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725.3000
Facsimile: (510) 725.3001
reed@hbsslaw.com
lucasg@hbsslaw.com

15 Peter A. Shaeffer (admitted *Pro Hac Vice*)
455 North Cityfront Plaza Drive, Suite 2410
Chicago, IL 60611
Telephone: (708) 628-4949
Facsimile: (708) 628-4950
petersh@hbsslaw.com

18 *Attorneys for Lead Plaintiff New Zealand
Methodist Trust Association*

21 **SIGNATURE ATTESTATION**

22 Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this Joint Case
23 Management Statement.

24 Dated: March 25, 2022

WILMER CUTLER PICKERING HALE
AND DORR LLP

25 By: /s/ Susan S. Muck
26 Susan S. Muck